

MARGOLIS EDELSTEIN
100 Century Parkway, Suite 200
Mount Laurel, NJ 08054
856-727-6000
Robert M. Kaplan, Esquire
Attorneys for Third-Party Defendant, Kingstec Industries Inc.
21575.1-0002 RMK

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Plaintiff	:
	:
	: No.: 2:07-cv-0072 (SDW) (MCA)
DR. MILTON PRYSTOWSKY, in his own	:
right and as EXECUTOR OF THE	:
ESTATE OF ROSE PRYSTOWSKY	: NOTICE OF KINGSTEC INDUSTRIES
	: INC.'S MOTION TO DISMISS THE
vs.	: THIRD PARTY COMPLAINT OF
	: PRIDE MOBILITY PRODUCTS CORP
Defendants	: FOR LACK OF PERSONAL
	: JURISDICTION
	:
TGC STORES, INC., ADT SECURITY	:
SERVICES, INC., INVACARE	:
CORPORATION, GOLDEN BROTHERS, INC.	:
d/b/a GOLDEN TECHNOLOGIES, PRIDE	:
MOBILITY PRODUCTS CORP.	:
	:
and	:
	:
Defendant/Third-Party Plaintiff	:
	:
Pride Mobility Products Corp.	:
	:
vs.	:
	:
Third-Party Defendants	:
	:
DEWERT MOTORIZED SYSTEMS, PHOENIX	:
MECANO, INC. and KINGSTEC	:
INDUSTRIES, INC.	:
	:

SIRS:

PLEASE TAKE NOTICE that the undersigned counsel for the third party defendants, Kingstec Industries Inc., will move before the United States District Court for the District of New Jersey, in

Newark, New Jersey, for a Motion Dismissing Plaintiff's Complaint based on lack of personal jurisdiction.

In support of the Motion, the movant shall rely upon the annexed Statement of Material Facts.

Oral argument is hereby requested.

A Proposed Form of Order is submitted herewith.

DATED: December 11, 2009

/s/Robert M. Kaplan

By: Robert M. Kaplan, Esquire
100 century Parkway, Suite 200
Mt. Laurel, NJ 08054
Phone: (856) 727-6000
Fax: (856) 727-6010
Attorneys for Third-Party
Defendant, Kingstec Industries
Inc.